

P.O. Box 450, MSIN H6-60 Richland, Washington 99352

AUG 17 2007

07-ESQ-131

Ms. Jane A. Hedges, Program Manager Nuclear Waste Program State of Washington Department of Ecology 3100 Port of Benton Blvd. Richland, Washington 99354



Dear Ms. Hedges:

SUBMITTAL OF HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT MODIFICATION NOTIFICATION FORM 24590-LAW-PCN-ENV-07-002

Reference: WA7890008967, "Dangerous Waste Portion of the Hanford Facility Resource

Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of

Dangerous Waste, Part III, Operating Unit 10, 'Waste Treatment and

Immobilization Plant."

This letter submits the Hanford Facility RCRA Permit Modification Notification Form 24590-LAW-PCN-ENV-07-002 (Attachment 1). The form describes a requested Class 1 modification to the Reference requiring approval from the Washington State Department of Ecology (Ecology). A Bechtel National, Inc. certification statement is provided in Attachment 2.

Modification Notification Form 24590-LAW-PCN-ENV-07-002 updates the Low-Activity Waste (LAW) Vitrification Building Piping and Instrumentation Diagrams for the LAW Primary Offgas Process System Concentrate Receipt Vessel LCP-VSL-00001, and LAW Primary Offgas Process System Concentrate Receipt Vessel LCP-VSL-00002, in Appendix 9.2 of the Reference.

Ecology was provided an opportunity to review the modification notification form and the associated information and comments were dispositioned.

If you have any questions, please contact me, or your staff may contact Lori A. Huffman, Office of Environmental Safety and Quality, (509) 376-0104.

Sincerely,

Shirley J Olinger, Acting Manager

Office of River Protection

ESO:LAH

Attachments: (2)

cc: See page 2

cc w/attachs:

Administrative Record H-0-8

BNI Correspondence

Environmental Portal, LMSI

cc electronic:

W. S. Elkins, BNI

B. G. Erlandson, BNI

P. A. Fisher, BNI

J. S. Hill, BNI

S. Murdock, BNI

P. Peistrup, BNI

D. Robertson, BNI

B. Becker-Khaleel, Ecology

E. A. Fredenburg, Ecology

T. Gao, Ecology

A. A. Hamar, Ecology

S. A. Thompson, FHI

A. C. McKarns, RL

D. J. Sommer, SCS

cc w/o attachs:

D. A. Klein, BNI

J. Cox, CTUIR

S. Harris, CTUIR

L. Cusack, Ecology

S. L. Dahl, Ecology

G. P. Davis, Ecology

G. Bohnee, NPT

K. Niles, Oregon Energy

R. Jim, YN

Attachment 1 07-ESQ-131

Hanford Facility RCRA Permit Modification Notification Form 24590-LAW-PCN-ENV-07-002

Hanford Facility RCRA Permit Modification Notification Form Part III, Operating Unit 10

Waste Treatment and Immobilization Plant

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Page 2 of 3: Hanford Facility RCRA Permit, Operating Unit 10, Waste Treatment and Immobilization Plant

Update LAW Vitrification Building Piping and Instrumentation Diagrams (P&IDs) for the LAW

Concentrate Receipt Process System Concentrate Receipt Vessel LCP-VSL-00001, LAW

Concentrate Receipt Process System Concentrate Receipt Vessel LCP-VSL-00002, in Appendix 9.2

of the Dangerous Waste Permit.

Submitted by Co-Operator:

1. Kl 7/24/01

, A. Klein Date

Reviewed by ORP Program Office:

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Class 1 modifications requiring prior Agency approval.

² If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.

Quarter Ending September 30, 2007

Hanford Facility RCRA Permit Modification Notification Form			
Unit:	Permit Part & Chapter: Part III, Operating Unit 10		
Waste Treatment and Immobilization Plant			

Description of Modification:

The purpose of this Class 1 prime modification is to update the following Piping and Instrumentation Diagrams (P&IDs) for the LAW Concentrate Receipt Process System Concentrate Receipt Vessel LCP-VSL-00001, LAW Concentrate Receipt Process System Concentrate Receipt Vessel LCP-VSL-00002. The following permit P&IDs are submitted to replace those currently in Appendix 9.2.

Appendix	9.2		
	24590-LAW-M6-LCP-P0001, Rev. 2	With:	24590-LAW-M6-LCP-P0001, Rev. 3
	24590-LAW-M6-LCP-P0002, Rev. 1		24590-LAW-M6-LCP-P0002, Rev. 2

The referenced P&IDs are complete revisions. They incorporate changes provided in applicable document change forms (e.g., DCN, SCN, SDDR, FCN, FCR, etc.) and changes associated with the resolution to comments on change documents since the issuance of the last revision of the permit drawing. This modification requests Ecology approval and incorporation into the permit. Revisions are the result of ongoing design changes. The following identifies the significant types of changes on the attached drawings.

LAW Vitrification Facility - Piping and Instrumentation Diagram P&ID 24590-LAW-M6-LCP-P0001 (Rev. 3)

The DCNs associated with changes to P&ID 24590-LAW-M6-LCP-P0001 are provided in drawing Note 43.

- Revised physical layout of LCP-VSL-00005
- Added overflow line from LFP-VSL-00002
- Changed Quality Designator from CM to Q
- Added and/or revised notes 1, 28 through 33 and Note 40 and their callouts such as symbols and legends, slopes, vaive locations, and system designators
- Added slope notation to numerous lines
- Added magnetic flow meter and associated instrumentation to pump discharge lines
- Corrected off-sheet coordinates
- Added ISA lines to bulges
- Added seismic category and quality flag designators
- Added nozzle size to vessel nozzles
- Incorporated various editorial comments

LAW Vitrification Facility - Piping and Instrumentation Diagram P&ID 24590-LAW-M6-LCP-P0002 (Rev. 2)

The DCNs associated with changes to P&ID 24590-LAW-M6-LCP-P0002 are provided in drawing Note 39.

- Revised Notes 1, 11 & 30 such as symbols and legends, slopes, system and vendor designations
- Revised physical layout of LCP-VSL-00006
- Changed Quality Designator from CM to Q
- Added overflow line from LFP-VSL-00004
- Added slope notation to numerous lines
- Modified depiction of vessel vent lines to show lines going into vessel
- Added magnetic flow meter and associated instrumentation to pump discharge lines

¹ Class 1 modifications requiring prior Agency approval.

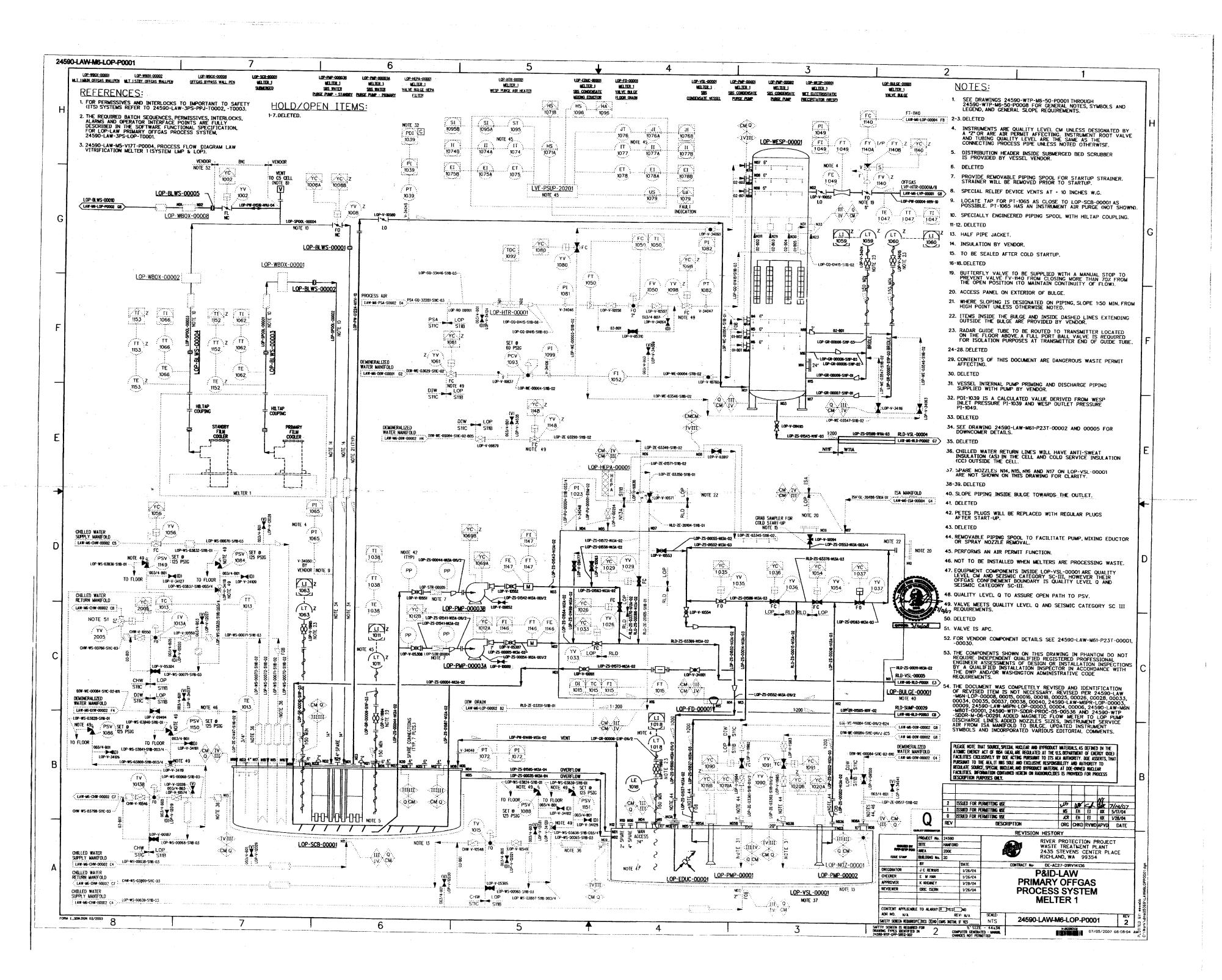
If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.

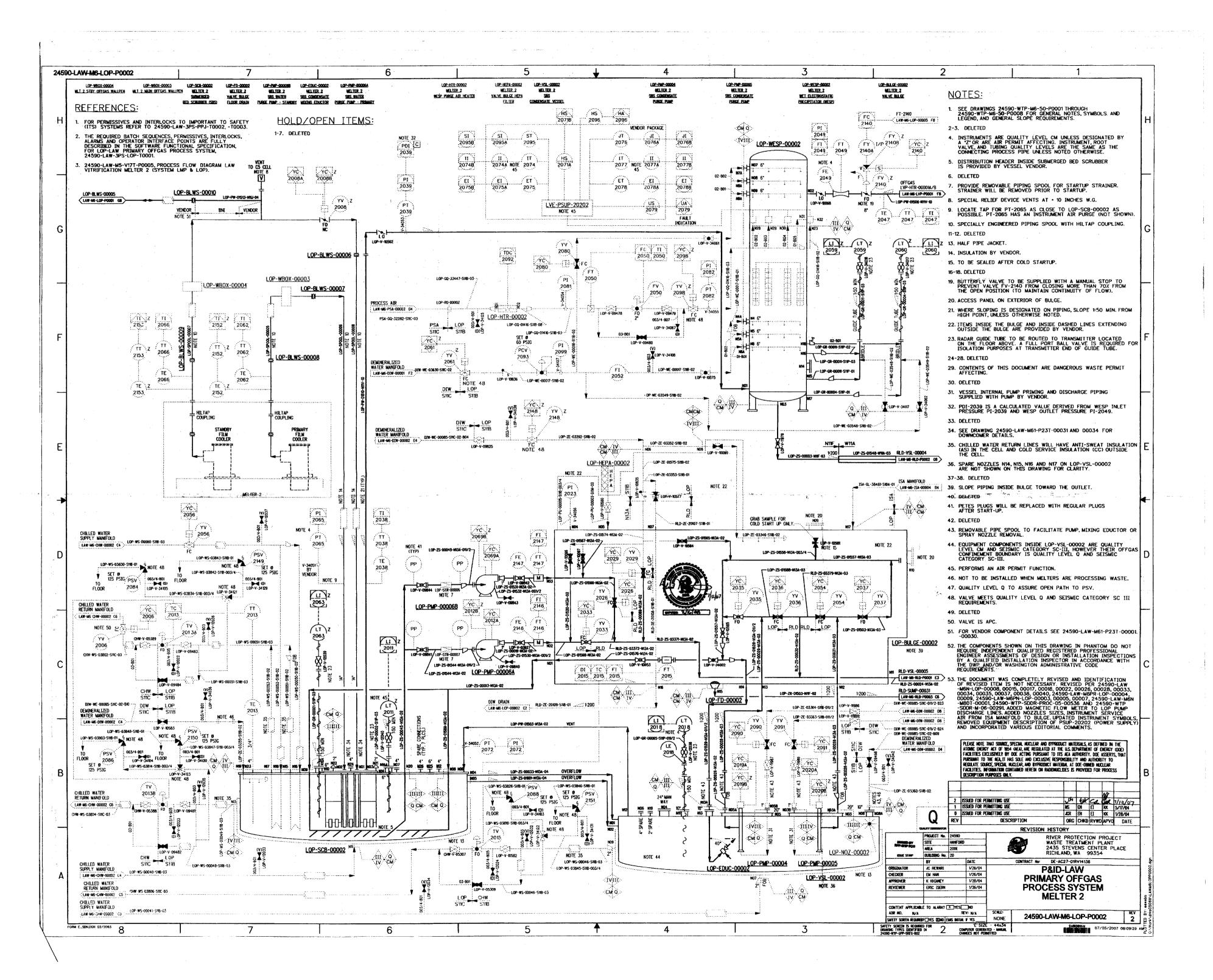
Quarter Ending September 30, 2007

 Corrected off-sheet coordinates Added ISA lines to bulges Added seismic category and quality flag designators Added nozzle size to vessel nozzles and deleted N21, N22, and N23 and added N18 Added label for LCP-BULGE-00001 Re-routed sample supply and return lines to ASX-SAMPLER-00012 from ASX-SAMPLER-00013 Incorporated various editorial comments 							
The following is a list of outstanding change document None	s that have not	been incorpora	ated into this m	odification:			
				- -			
			_				
WAC 173-303-830 Modification Class: 12	Class 1	Class 11	Class 2	Class 3			
Please mark the Modification Class:		X					
Enter Relevant WAC 173-303-830, Appendix I Modific number:		N/A					
Enter wording of WAC 173-303-830, Appendix I Modi	fication citation:		_1_445				
In accordance with WAC 173-303-830(4)(d)(i), this mapproved as a Class ¹ 1 modification. WAC 173-303-6 changes that keep the permit current with routine changes.	830(4)(d)(ii)(A) s	itates, "Class"	modifications	apply to minor			
substantially alter the permit conditions or reduce the environment. In the case of Class 1 modifications, the	capacity of the	racility to prote	ct numan nealt	h or the			
Modification Approved: Yes No (state reason for denial) Reason for denial:		Reviewed by Ecology:					

Date

B. Becker-Khaleel





Attachment 2 07-ESQ-131

Bechtel National, Inc. Certification Statement

Bechtel National, Inc. Certification

The following certification statement is provided consistent with Contract No. DE-AC27-01RV14136, Section H.26, Environmental Permits, paragraph (g) for the submittal of the Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form 24590-LAW-PCN-ENV-07-003.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

W.S. Elkins

Project Director

Date